

SCOTT N. SCHOOLS (SC 9990)  
United States Attorney

MARK L. KROTOSKI (CASBN 138549)  
Chief, Criminal Division

JEFFREY R. FINIGAN (CASBN 168285)  
Assistant United States Attorney

450 Golden Gate Avenue  
San Francisco, California 94102  
Telephone: (415) 436-7232  
Facsimile: (415) 436-7234  
Email: jeffrey.finigan@usdoj.gov

Attorneys for Plaintiff

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA, )  
 )  
Plaintiff, )  
 )  
v. )  
 )  
MICHAEL EDISON, )  
 )  
Defendant. )

Criminal No. CR 07-0074 WHA

**STIPULATION AND ~~PROPOSED~~  
ORDER EXCLUDING TIME**

The above-captioned matter came before the Court on March 20, 2007, for initial appearance. The defendant was represented by John G. Hanlin, Esq., and the government was represented by Jeffrey Finigan, Assistant United States Attorney. The matter was continued to April 17, 2007, at 2:00 p.m. for motions and trial setting.

The Court made a finding that the time from and including March 20, 2007, through and including April 17, 2007, should be excluded under the Speedy Trial Act, 18 U.S.C. § 3161(h)(8)(A), because the ends of justice served by taking such action outweighed the best

1 interest of the public and the defendant in a speedy trial. The finding was based on the need for  
 2 the defendant to have reasonable time necessary for effective preparation, taking into account the  
 3 exercise of due diligence, and for continuity of counsel pursuant to 18 U.S.C.

4 § 3161(h)(8)(B)(iv).

5 The parties hereby agree to and request that the case be continued until April 17, 2007,  
 6 and that the exclusion of time until then be granted. The parties agree and stipulate that the  
 7 additional time is appropriate and necessary under Title 18, United States Code, § 3161(h)(8)(A),  
 8 because the ends of justice served by this continuance outweigh the best interest of the public and  
 9 the defendant in a speedy trial. This time exclusion will allow defense counsel to effectively  
 10 prepare, taking into account the exercise of due diligence, and will provide for continuity of  
 11 counsel for the defendant.

12  
 13 DATED: April 16, 2007


/s/  
 \_\_\_\_\_  
 JOHN G. HANLIN  
 Counsel for Michael Edison

14  
 15  
 16 DATED: March 20, 2007

/s/  
 \_\_\_\_\_  
 JEFFREY R. FINIGAN  
 Assistant U.S. Attorney

17  
 18  
 19 So ordered.

20 DATED: April 17, 2007

  
 \_\_\_\_\_  
 WILLIAM H. ALSUP  
 UNITED STATES DISTRICT COURT JUDGE